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8 Manila, LLC; Millie Cadag and Homer
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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

JOE HAND PROMOTIONS, INC., a
Pennsylvania corporation.

Plaintiff,

V.

CAFÉ DE MANILA, LLC, a Nevada limited liability company d/b/a CAFÉ DE MANILA; MILLIE CADAG, an individual; and HOMER TUAZON, an individual,

Defendants.

CASE NO. 2:22-cv-001086-CDS-DJA

**STIPULATION AND ORDER TO
EXTEND TIME FOR DEFENDANT TO
RESPOND TO PLAINTIFF'S
COMPLAINT**

(First Request)

19 Defendants' response to Plaintiff Joe Hand Promotions, Inc.'s ("Plaintiff")
20 complaint was due on November 4, 2022. Defendants and Plaintiff agree that
21 Defendants have up to and including November 28, 2022, to respond to Plaintiff's
22 complaint. Good cause and excusable neglect under LR IA 6-1 exists because the
23 defendants require additional time to investigate plaintiff's allegations and for the
24 parties to discuss a potential early resolution of the claims asserted against
25 Defendants in this matter.

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2 This is the first request for an extension, and it is made in good faith and not
3 for purposes of delay.

4 DATED this 10th day of November, 2022.

5 BALLARD SPAHR LLP

6 GILE LAW GROUP

7 By: /s/ Joseph Dagher

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15 By: /s/ Ryan Gile

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23 **ORDER**

24 IT IS SO ORDERED:

25 
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UNITED STATES MAGISTRATE JUDGE

27 DATED: November 14, 2022

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